



THE COMMONWEALTH OF MASSACHUSETTS  
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF  
TELECOMMUNICATIONS & ENERGY**

**ONE SOUTH STATION**

**Boston, MA 02110  
(617) 305-3500**

**MITT ROMNEY**  
GOVERNOR

**KERRY HEALEY**  
LIEUTENANT GOVERNOR

**BETH LINDSTROM**  
DIRECTOR  
OFFICE OF CONSUMER AFFAIRS  
AND BUSINESS REGULATION

**PAUL G. AFONSO**  
CHAIRMAN

**JAMES CONNELLY, ESQ.**  
COMMISSIONER

**W. ROBERT KEATING**  
COMMISSIONER

**EUGENE J. SULLIVAN, JR.**  
COMMISSIONER

**DEIRDRE K. MANNING**  
COMMISSIONER

David S. Rosenzweig, Esq.  
Keegan, Werlin & Pabian, LLP  
21 Custom House Street  
Boston, MA 02110

BY FAX AND U.S. MAIL

RE: Boston Edison Company and Commonwealth Electric Company, D.T.E. 03-96

October 14, 2003

Dear Mr. Rosenzweig:

Enclosed please find the Department's first set of information requests on the above-captioned matter. Responses should be filed on or before October 28, 2003. If you have any questions, please feel free to contact me at (617) 305-3620.

Sincerely,

William H. Stevens, Jr.  
Hearing Officer

cc: Mary Cottrell  
Staff as assigned  
Joseph Rogers, Assistant Attorney General

Encl.

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

FIRST SET OF INFORMATION REQUESTS OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO  
BOSTON EDISON COMPANY AND COMMONWEALTH ELECTRIC COMPANY

Pursuant to 220 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Boston Edison Company and Commonwealth Electric Company the following information requests with respect to the above captioned matter.

**Instructions**

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to Boston Edison Company and Commonwealth Electric Company in this proceeding.

1. "NSTAR Electric" or "Companies" means Boston Edison Company and Commonwealth Electric Company, its officers, directors, employees, consultants, and attorneys.
2. "Company Filing" or "Filing" means all the documents NSTAR Electric filed in this proceeding on September 23, 2003.
3. "Seller" or "Entergy" means Entergy Nuclear Generation Company.
4. "Entergy PPAs" means the purchased power agreements entered into between Entergy, Boston Edison Company, and Commonwealth Electric Company, approved by the Department in Boston Edison Company, D.T.E. 98-119/126 (1999).
5. "Entergy PPA Amendments" means the three documents entitled: "First Amendment to the Power Purchase Agreement Between Entergy Nuclear Generation Company and Boston Edison Company" (Att. A to the Filing); "First Amendment to the Power Purchase Agreement Between Entergy Nuclear Generation Company and Commonwealth Electric Company" (Att. B to the Filing); and "First Amendment to the Power Purchase Agreement With Respect to the Municipal Entitlements Between Entergy Nuclear Generation Company and Boston Edison Company" (Att. C to the Filing).
6. "Facility" means the generating facility known as the Pilgrim Nuclear Power Station in Plymouth, Massachusetts.
7. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
8. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.

9. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
10. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.
11. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
12. If the Company finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
13. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; and (2) Robert Harrold, Electric Power Division.

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**FIRST SET OF INFORMATION REQUESTS OF  
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO  
BOSTON EDISON COMPANY AND COMMONWEALTH ELECTRIC COMPANY**

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Boston Edison Company and Commonwealth Electric Company the following information requests.

- DTE-1-1      Refer to the Entergy PPA Amendments. The amendments state that the Seller is making modifications which will result in an increase in the rating of the Facility.
- (a) identify the entity that will determine the new rating of the Facility;  
(b) describe the procedures to be used by that entity when making the new rating; and  
(c) estimate the incremental difference, in megawatts, between the old rating and the new rating.
- DTE-1-2      Refer to the Entergy PPA Amendments. Is it correct to assume that the price terms of the Entergy PPAs between Boston Edison Company and Entergy Nuclear Generation Company remain unchanged by the amendments? If not, please explain. Provide complete and detailed documentation to support your response.
- DTE-1-3      Refer to the Entergy PPA Amendments at 2. Have these amendments been filed with FERC? With what result? Please explain.
- DTE-1-4      Refer to the Entergy PPA Amendments at 1. Please explain the basis for selecting the respective Adjustment Percentages shown in the amendments. Provide complete and detailed documentation to support your response.
- DTE-1-5      Refer to the Entergy PPA Amendments at 1. Specify the exact date that the Entergy PPAs terminate in 2004.
- DTE-1-6      Please provide a copy of the Entergy PPAs.